UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF NEW YORK

THOMAS E. PEREZ, Secretary of Labor, United States Department of Labor,

Plaintiff,

v.

CLEARVIEW OPERATING CO. LLC d.b.a. THE GRAND AT QUEENS; THE CENTER FOR REHABILITATION AND HEALTH CARE AT DUTCHESS, LLC d.b.a. THE GRAND AT PAWLING; GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE FACILITY OPERATING COMPANY, LLC d.b.a. GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE; ROME CENTER LLC d.b.a. THE GRAND AT ROME; CHITTENANGO CENTER LLC d.b.a. THE GRAND AT CHITTENANGO; and JEREMY STRAUSS, Individually,

Defendants.

Civil Action No. 1:16-cv-06355

COMPLAINT

Plaintiff, THOMAS E. PEREZ, Secretary of Labor, United States Department of Labor, by and through undersigned counsel, brings this action under Sections 16(c) and 17 of the Fair Labor Standards Act of 1938, as amended (29 U.S.C. § 201, et seq.) ("the Act" of "the FLSA"), alleging that Defendants violated Sections 7, 11(c), 15(a)(2), and 15(a)(5) of the Act to recover back wages, liquidated damages, and to enjoin acts and practices which violate the provisions of the FLSA, and to obtain other appropriate relief.

JURISDICTION AND VENUE

1. Jurisdiction over this action is properly conferred upon this Court by Section 17 of the FLSA, 29 U.S.C. § 217, and 28 U.S.C. §§ 1331 and 1345.

2. Venue is proper in the United States District Court for the Eastern District of New York because a substantial part of the events or omissions giving rise to the claims herein occurred in this District.

FACTUAL ALLEGATIONS

The Parties

3. Plaintiff, THOMAS E. PEREZ, Secretary of Labor, United States Department of Labor, is vested with authority to file suit to restrain violations of the FLSA and recover back wages and liquidated damages and is the proper plaintiff for this action.

4. Defendant CLEARVIEW OPERATING CO. LLC d.b.a. THE GRAND AT QUEENS ("The Grand at Queens") is a corporation organized under the laws of the State of New York having its principal place of business at 157-15 19th Avenue, Flushing, New York, 11357, within the jurisdiction of this court, where it is engaged in the business of providing healthcare services.

5. Defendant THE CENTER FOR REHABILITATION AND HEALTH CARE AT DUTCHESS, LLC d.b.a. THE GRAND AT PAWLING ("The Grand at Pawling") is a corporation organized under the laws of the State of New York having its principal place of business at 9 Reservoir Road, Pawling, New York, 12564, where it is engaged in the business of providing healthcare services.

6. Defendant GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE FACILITY OPERATING COMPANY, LLC d.b.a. GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE ("The Grand at Guilderland") is a corporation organized under the laws of the State of New York having its principal place of business at 428

NY-146, Altamont, New York, 12009, where it is engaged in the business of providing healthcare services.

7. Defendant ROME CENTER LLC d.b.a. THE GRAND AT ROME ("The Grand at Rome") is a corporation organized under the laws of the State of New York having its principal place of business at 801 N. James Street, Rome, New York, 13440, where it is engaged in the business of providing healthcare services.

8. Defendant CHITTENANGO CENTER LLC d.b.a. THE GRAND AT CHITTENANGO ("The Grand at Chittenango") is a corporation organized under the laws of the State of New York having its principal place of business at 331 Russell Street, Chittenango, New York, 13037, where it is engaged in the business of providing healthcare services.

9. The defendant businesses referenced in paragraphs 4 through 8 above (collectively the "corporate defendants" or "The Grand Healthcare System") have regulated the employment of all persons employed by them, acted directly and indirectly in the companies' interest in relation to the employees, and thus are employers of the employees within the meaning of Section 3(d) of the Act.

10. Defendant JEREMY STRAUSS is the Chief Executive Office and partial owner of the corporate defendants and is in active control and management of all the corporate defendants. Defendant JEREMY STRAUSS has acted directly and indirectly in the interest of all of the corporate defendants in relation to employees during the relevant time period. He is thus an employer of the employees within the meaning of Section 3(d) of the Act. Defendant JEREMY STRAUSS resides in Long Island, New York, within the jurisdiction of this court.

Defendants Are an Enterprise Engaged in Commerce

11. The business activities of Defendants, as described herein, are related and performed through unified operation and common control for a common business purpose, and constitute an enterprise within the meaning of Section 3(r) of the Act.

12. The corporate defendants are all engaged in operating nursing homes and rehabilitation facilities and have common and centralized operational management and ownership by individual defendant Jeremy Strauss.

13. The corporate defendants shared the same accounting firm, Centers for Specialty Care Group LLC, d/b/a Centers Healthcare, until approximately May 2015, at which time they started using the same in-house payroll manager.

14. The enterprise had an annual gross volume of sales made or business done in an amount not less than $500,000 for the years 2013, 2014 and 2015. The enterprise is engaged in the operation of a hospital. Therefore, the employees are employed in an enterprise engaged in commerce or in the production of goods for commerce within the meaning of Section 3(s)(1)(B) of the Act.

Defendants' Pay and Recordkeeping Practices

Failure to Pay Overtime

15. Defendants employ employees as Registered Nurses, Licensed Practical Nurses, Certified Nursing Assistants, Occupational Therapists, Physical Therapists, Physical Therapist Assistants, Certified Occupational Therapy Assistants, Speech Language Pathologists, Nursing Secretaries, Maintenance Directors, and Medical Records Employees.

16. At all relevant times, many of Defendants' employees worked in excess of 40 hours per work, often between 42 and 66 hours per week, but were not paid for all hours worked,

and therefore, were not paid one and one-half their regular rate of pay as prescribed in Section 7 of the Act, 29 U.S.C. § 207(a).

17. At all relevant times, many of Defendants' nursing staff, including Licensed Practical Nurses and Certified Nursing Assistants, were scheduled for eight-hour daily shifts for up to six days per week, and during some of those workdays, worked back-to-back eight-hour shifts.

18. Depending on the location, employees were allowed to take 30 or 60 minute meal breaks. However, as a result of patient duties, employees often had to work through their lunch breaks or otherwise did not have at least 20 minutes of uninterrupted break time during their shifts.

19. At all relevant times, and at every location except The Grand at Pawling, Defendants' employees punched in on a time clock when they began working and punched out when they finished working, including if they worked additional hours beyond their scheduled shifts.

20. At all relevant times, and at every location except The Grand at Queens, employees indicated on their punch cards whether they had worked through their meal breaks that day.

21. At all relevant times, many of Defendants' employees, including Licensed Practical Nurses and Certified Nursing Assistants, routinely began working before the start of their scheduled shifts and stopped working after the end of their scheduled shifts, often for up to several additional hours each day, typically as a result of patient duties and/or to finalize patient reports and nursing notes. Defendants' employees received no additional compensation for these extra hours worked even though Defendants knew they were working these extra hours.

22. At all relevant times, many of Defendants' employees also routinely worked through their daily meal breaks but received no additional compensation for these extra hours worked even though Defendants knew they were working these extra hours. Defendants took improper deductions from employees' wages for meal breaks not actually taken, or for deductions for meal breaks shorter than 20 minutes in length.

23. For example, during the week ending during the week ending October 26, 2013, a Licensed Practical Nurse at The Grand at Queens was scheduled to work six eight-hour daily shifts, each from 3:00 pm to 11:00 pm. During this workweek, this employee generally punched in and started working before his shift was scheduled to start, at around 2:45 pm each day, and always punched out and stopped working well after his shift was scheduled to end, at 12:43 am, 12:51 am, and once even 1:18 am. This employee also worked through each of his meal breaks during this workweek. Not only did Defendants fail to pay this employee overtime for his extra hours worked, they also deducted for daily 60 minute lunch breaks from his work hours for meal breaks that he did not actually take. As a result, this employee worked for 64.5 hours in this particular workweek, but was only paid for 41.75 hours of work.

24. Further, Defendants improperly misclassified some of their employees as exempt employees, and therefore failed to pay those employees proper overtime for their hours over 40 in a workweek. Defendants also improperly paid some non-exempt employees at straight time rates for overtime hours worked.

Recordkeeping

25. At all relevant times, and at every location within The Grand Healthcare System, Defendants did not maintain accurate and complete payroll records of their employees' total daily or weekly hours, or the total overtime hours that their employees worked each week.

Specifically, Defendants' payroll records did not reflect the additional hours that employees worked beyond their scheduled shifts.

26. Additionally, at all relevant times at The Grand at Queens and The Grand at Pawling, Defendants did not maintain accurate time records. At these locations, Defendants did not create or maintain adequate and accurate time records of employees' total daily and weekly hours, or the total overtime hours that their employees worked each week.

27. Specifically, at The Grand at Queens Defendants did not create or maintain time records reflecting when their employees worked through their meal breaks.

28. Specifically, at The Grand at Pawling Defendants did not create or maintain time records reflecting the additional hours that employees worked beyond their scheduled shifts. At this location, when employees worked beyond their scheduled shifts, they were required to fill out and submit to their supervisors a "punch error form" with their actual start and stop times, as well as the reason they worked beyond their scheduled shifts. However, the extra hours reflected on the "punch error forms" were not reflected in Defendants' time records or payroll records.

Prior Investigations

29. The Grand at Pawling was previously investigated by the U.S. Department of Labor on five separate occasions in the last ten years, with overtime violations found during each investigation due to the same violations described in this Complaint: deductions for lunch breaks not actually taken or lunch breaks shorter than 20 minutes in length and failure to pay employees for pre-shift and post-shift work.

30. The Grand at Rome was also previously investigated by the U.S. Department of Labor in 2010, with overtime violations found due to deductions for lunch breaks not actually taken.

31. The Grand at Guilderland was previously investigated by the New York State Department of Labor in 2015, with overtime violations found due to failure to pay for pre-shift and post-shift work.

FIRST CAUSE OF ACTION

Violation of Sections 7(a) and 15(a)(2) of the FLSA, Failure to Pay Overtime

32. The Secretary incorporates by reference and re-alleges the allegations in paragraphs 1 to 31 of the Complaint.

33. Defendants have willfully violated the provisions of Sections 7 and 15(a)(2) of the Act by employing their employees listed in Exhibit A in an enterprise engaged in commerce or in the production of goods for commerce, for workweeks longer than those prescribed in Section 7 of the Act without compensating the employees for their employment in excess of the prescribed hours at rates not less than one and one-half times the regular rates at which they were employed.

34. Defendants' actions as described herein have been willful, as the corporate defendants have an extensive history of violations of the Act.

35. Therefore, Defendants are liable for unpaid overtime compensation and an equal amount in liquidated damages under section 16(c) of the Act or, in the event liquidated damages are not awarded, unpaid overtime compensation and prejudgment interest on said unpaid overtime compensation under Section 17 of the Act.

SECOND CAUSE OF ACTION
Violation of Sections 11(c) and 15(a)(5) of the FLSA

36. The Secretary incorporates by reference and re-alleges the allegations in paragraphs 1 to 31 of the Complaint.

37. Defendants have willfully violated the provisions of sections 11(c) and 15(a)(5) of the Act, in that Defendants failed to make, keep, and preserve adequate and accurate records of

their employees and of the wages, hours, and other conditions of employment which they maintained as prescribed by the Regulations issued and found at 29 CFR Part 516. Specifically, Defendants failed to keep adequate and accurate records of their employees' actual daily and weekly hours of work.

WHEREFORE, cause having been shown, Plaintiff respectfully prays for judgment against Defendants providing the following relief

1. An injunction issued pursuant to Section 17 of the Act permanently restraining Defendants, their officers, agents, servants, employees, and those persons in active concert or participation with Defendants, from violating the provisions of Sections 7, 11(c), 15(a)(2), and 15(a)(5) of the Act; and

2. An order pursuant to Section 16(c) of the Act finding Defendants liable for unpaid overtime compensation found due Defendants' employees listed on the attached Exhibit A and an equal amount of liquidated damages; or

3. In the event liquidated damages are not awarded, an injunction issued pursuant to Section 17 of the Act restraining Defendants, their officers, agents, employees, and those persons in active concert or participation with Defendants, from withholding the amount of unpaid overtime compensation found due Defendants' employees and prejudgment interest computed at the underpayment rate established by the Secretary of Treasury pursuant to 26 U.S.C. § 6621; and

4. An order compelling Defendants to reimburse the Secretary for the costs of the action; and

5. An order granting such other relief as the Court may deem necessary or appropriate.

DATED: November 15, 2016
New York, New York

___s/ M. Patricia Smith____
M. PATRICIA SMITH
Solicitor of Labor

___s/ Jeffrey S. Rogoff____
JEFFREY S. ROGOFF
Regional Solicitor

___s/ Orly Shoham________
ORLY SHOHAM
Attorney
Office of the Regional Solicitor
201 Varick Street, Room 983
New York, NY 10014
(646) 264-3656
(646) 264-3660 (fax)
Shoham.Orly@dol.gov
NY-SOL-ECF@dol.gov

Attorneys for THOMAS E. PEREZ,
Secretary of Labor, Plaintiff

EXHIBIT A

CLEARVIEW OPERATING CO. LLC d.b.a. THE GRAND AT QUEENS

Ababrese, Prince
Abraham, Gagandai
Adams, Elizabeth
St. Aime, Daphnee
Akindele, Karlene
Albert, Irvine
Bariana, Jyoti
Barnett, Carol
Barrie, Mariama
Benjamin, Tashika
Bereza, Marina
Bermeo, Lourdes
Bernard, Armande
Braithawithe, Rosemarie
Calamiong, Aldwin
Calle, Lisa
Cameus, Aeronne
Chen, Jing Jing
Cheng, Tony
Choi, Ji Hye
Choi, Michael
Clarke, Kahleel Locke
Concert, George N.
Corrado, Vincent
Cummings, David
Danquach, Abenaa
Dorce, Marie Claire
Dorsainvil, Tonino
Dyer, Monique
Emmanuel, Judith
Erhumnwunsee, Joan
Escabarte, Raquel
Farrell, Leroy
Ferrara, Joyce
Fleurjuste, Beatrice
Francis, Sonia
Gekonge, Elsebah
Gouse, Kareen
Gozum, Neal

Gozum, Nico
Grinnell, Velma D.
Gutierrez, Jose
Hashimoto, Minori
Hernandez, Daniel
Higgins, Jessica
Horng, Frank
Hostin, Rachel
Huber, Melissa
Hutchinson, Carolyn
Ileto, Maricris
Ingram, Barry
Ishkanian, Amy
Ivanovic, Lenka
James, Enola
Joaquin, Joanne
Judith, Emmanuel
Jung, Sungil
Kawaley, Samuel
Labial, Ferdinand
Laguerre, Aline
Lahens, Sandrale
Lee, Yong Ja
Leone, Margaret
Levy, Lyudmila
Litimco, Donnie
Lyn, Jacqueline
Malcolm, Taryn
Mattadeen, Adrian
Mccann, Kristina
Meade-Kennedy, Blondelle
Myers, Shawn
Myrthil, Marie Louise
Napatsang, Tenzin Tsering
Normatova, Shushana
Ofori, Mercy
Ogbeta, Abieyuwa
Oguguo, Fabian
Okolie, Rita
Okolonji, Emmanuel
Owoborode, Kehinde
Passang, Tenzin
Patel, Vipul

Peralta, Marlon
Philemond, Marie
Philip, Mary
Pierre-Paul, Mike
Politova, Oksana
Pushwinder, Kaur
Rampershad, Eshwar
Reilly, Denise
Rios, Lilian
Rios, John
Rountree, Laquette
Saint Surin (Arnault), Marie
Sanchez, Cristina
Sharedalal, Sneha
Siamas, Gercianeide
Singh, Bhupinderjit
Skaria, Grace
Spells, Anwar
Stella, Osmena
Torres, Jasmine
Tsentso, Tsering
Valentine, Geraldine Prevost
Vaughn, Fenella
Verna, Marie
Whitley, Kristen
Whitted, Cindy
Whitted, Regina
Zamora, Catherine
Zhu, Jian Xin

THE CENTER FOR REHABILITATION AND HEALTH CARE AT DUTCHESS, LLC d.b.a. THE GRAND AT PAWLING

Abiba, Toure
Ackerman, Alicia
Adams, Vicki Ann
Addo-Dombo, Patricia
Adipietro, Christine
Adomako, Angela
Albrecht, Terriann
Alegria, Gina
Anderson, Wykecia
Angelico, Frank

Angot, Eve. M.
Ann, Matthews
Apenteng, Tanae
Armstrong, Rosa
Artis, Veronica
Asare, Tina
Atkinson, Patricia
Bailey, Kareen
Balde, Amoul
Balzano, Wilma
Belafonte, Latisha
Belding, Katrina
Bennett, Joy
Bennett, Patricia
Bergdall, Gina
Blackwood, Celia
Bobo, Evantz
Boykin, Chaquanna
Brega, Rockie A
Bromfield, Alexia
Brown, Ashanti
Brown, Monique
Bucalo, Richard
Buffone, Dominic
Bunch, Karissa
Bush, Nicole
Bush, Natara
Buyan, Dorothy
Caffrey, Judith
Calderon, Madelyn
Canales, Stephanie
Cantave, Gertrude
Caporale, Victoria
Carr, Le Andra
Carrasco, Connie
Carrasco Lopez, Yamilde
Carrington, Barry
Carrington, Denise
Carter, Isaiah
Charley, Menique
Cherry, Tavonna
Chin, Scott
Clarke, Colleen

Coleman, Sharon Russell
Conley, Christian
Copeland, Kristen
Correa, Jasmin
Cortez, Tabatha
Coughlin, Janet
Craigie, Tamara
Cramp, Carla
Crawford, Nelita
Cutler, Jeannine
Cutlip, Amanda
Dangleben, Juliette
Danice, Osman Asante
Daniels, Lisa Penny
Davies, Jean
Davis, Royalty
Davis, Josephine
Delus Sanros, Emelita
Derello, Rondisha
Deremoncourt, Cathrine
Dermetrices, Jacqueline M
Devries, Christine
Djaine, Joel
Djanie, Joan
Doetsch, Barbara
Dostilio, Jenna
Dzimadzor, Mavis
Dzimadzor, Sally
Ecter, Alicia
Edwards, Beryl
Edwards, Lula
Estrada, Ramiro
Eugene, Huguette
Fabre, Marie
Fajardo, Julius
Falcaro, Jeanne
Fantroy, Deborah
Farina, Terry
Felice-Hill, April
Fells, Kelly
Figueroa, Janelle
Fitzmaurice, Jody
Flanders, Paula

Fontanez, Chrichany
Ford-Mimms, Marisa
Franklin, Angelina
Franzel, Diane
Friedman, Grethel
Frisbee, Sabine
Fuller, Cheri
Gallagher, Anastasia
Garrett, Cherry
Gaya-Austin, Moya
Germano, Virginia
Gilchrist, Robin
Goff, Maria
Goldbar, Catheeine
Gonzalez, Monique
Goodchild, Bonnie
Green, Christina
Green, Briana
Gregory, Katherine
Guerrieri, Rebecca
Guerrieri, Barbara
Gwathney, Tiffany
Hale, Ashley
Hallock, Amy
Hamilton, Kathleen
Hamilton, Mary
Harley, Patricia
Haughton, Henry
Haye, Cassa
Hector, Sherry
Highsmith, Shaquita
Hines, Bonita
Hines, Patricia
Hluboky, Skyeleen
Hunter, Tenesha
Jablonski, Ray
Jackson, Sarah
Jacob, Soffy
Jaeschke, Amanda
James-Echols, Marcelle
Jeltsch, Jerry
Jiminski, Jaclyn
Johnson, Patricia

Johnson, Starr
Johnson, Mariyah
Johnson, Belinda
Johnson, Heidi
Johnson Evans, Patrica
Jones, Adrienne
Jones, Dorothea
Joseph, Shelly
Keane, Erica
Kelleher, Corinne
Kelly, Betsy
Khan, Nazeema
King, Christina
Knapp, Amanda
Kopelman, Joyce
Koroma, Mariama
Koukis, Jennifer
Lamonica, Melissa M
Latimer, Realistic
Lawes, Tanya
Lawrence, Geraldine
Lehmann, Eric
Lento, Laura
Leonette-Scavo, Michelle
Liu, Ying
Lloyd, Bernice
Lore, Alicia
Mackay, Lori
Mackoon, Damiana
Majette, Madeline
Maneely, Melissa
Mathura, Vidya
Mcgrath, Elizabeth
Mckee, Danielle
Mcpherson, Johnna
Mcpherson, Joediann
Meade-Kennedy, Blondelle
Medina, Ashley
Medina, Alvin
Mekam, Carine
Mensah-Quaye, Joyce
Mighty, Chantal
Miller, Leland

Mills, Joan
Mima, Darlene
Mincey, Jadia
Missler, Paul R
Mitchell, Amy
Mitchell, Cynthia
Mohammed Bello, Ayisha
Montgomery, Sarah
Morris, Bonny
Myasia, Hayes
Myrick, Wilhelmina
Neely, Bernice
Newenle, Moonasharta
Nkamany, Chris
Noonan, Elizabeth
Norman, Tina
Nyaaba, Mary
O`Brien, Shannon
Ogaree, Benjamin
Ott, Gerri
Owens, Earline
Palmero, Melanie
Papazian, Jana
Parchment, Paulla
Paulino, Rosmery
Payne, Kellyann
Peck, Mika
Perri, Sandra
Peterson, Rachel
Pinyan, Renee
Plass, Kristyn
Pogue, Jessica
Porteous, Tanya
Pousson, Raymond
Powell-Brown, Carole
Price-Reed, Kimberley
Pryce, Christine
Quartironi, Teresa
Ramos, Cassandra
Recht, Devorah Z
Redl, Rick
Riddick, Khary
Rivera, Iselty

Robisheaux, Isabella
Rodriguez, Melinda
Rose, Gray
Rouse, Paul
Russell Coleman, Sharon
Russo, Matthew
Saunders, Marsherl
Sawadogo, Wendepasde
Schartau, Susan
Schiavo, Suzanne
Schlosser, Aleta
Scott, Sherese
Scully, Barbara
Seckler, Christine
Seeram, Jean Ruth
Shield, Mary
Sickles, Tiffany
Sieligowski, Catherine
Simpson, Therecia
Small, Brooke
Smith, Marcia
Smith, Tarnisha
Smith, Renee
Spearman, Okeia
Steins, Eric
Stephen, Jheanell
Stier, Shelby
Stratica, Nicoleta
Sweet, Cindy
Taylor, Georgette
Taylor, Michael
Taylor, Quishawnda
Tejeda, Joanne
Temirgaliyeva, Assem
Thapa, Malati
Thomas, Keisha
Thompson, Cheryl
Tomlins, Toni
Tranquada, Vicky
Tucci, Valerie
Turner, Aaron
Turner, Kawane
Ugwejeh, Kelvin

Underwood, Jacquetta
Valoy, Elizabeth
Vargas, Keren
Vegeto, Marie
Venske, Lisa
Viera, Alejandra
Villaflor, Cecilia
Vinciguerra, Stephanie
Waddell, Latoya
Wagner, April
Walker, Christina
Walker, Trina
Washburn, Justin
Washington, Vyra
Westfall, Shawna
Wheatley, Patrick
Wheeler, Priscilla
White, Beverly
White, Ronnisha
White, Deborah
Williams, Althea
Williams, Rafeeqa
Williams, Cassiopia
Wilson, Anin
Wolven-Johnson, Autumn
Woodberry, Whitney
Woodward, Shakeya
Young, Ashley
Young, Enid
Zagarella, Ashley

GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE FACILITY OPERATING COMPANY, LLC d.b.a. GUILDERLAND CENTER REHABILITATION AND EXTENDED CARE

Aviles, Mary Ann
Bonney, Eliza
Braelfort, Danielle
Breyette, Brenda
Brisbin, Ian
Courtwright, Kristy
Crandall, Erin
Dadekian, Joyce

Eagan, Kristen
Esposito, Jennifer
Everett, Tracey
Findley, Mamaceta
Fletcher, Debra
Freund, Georgette
Gonsalves, Andrea
Gowrie, Rajmatie
Gravely, Ralph
Gyan, Mark Kwame
Hayden, Raffaele
Hazen, Melissa
Holloman, Bernard
Immandeen, Meanwattie
Keenan, Kimberly
Kilori, Pauline
Lauletta, Maria
Lupumpala, Erin
McIntyre, Jenna
McNulty, Tammie
Namubiru, Winfred
Nilsen, Anne
Pavone, Cheryl
Pecotte, Deborah
Pierce, Darlene
Purdy, Sarah
Reedy, Diana
Reedy, Tammy
Ribley, Sara
Rose, Joann
Roseberry, Valerie
Trahan, Joshua
Van Vranken, Sherry
Wilday, Linda
Wittig, Deborah

ROME CENTER LLC d.b.a. THE GRAND AT ROME

Addison, Misty
Allen, Andrea
Amoah, Janet
Apgar, Dustin
Archer, Catherine
Armstrong, Marqueta

Arno, Theresa
Arnold, Jenna
Austin, Melissa
Baker, Samantha
Baker, Susan
Barbato, James
Beavers, Angela
Beckwith, Tyler
Bellman, Christine M
Bengough, Ryon
Berg, Amy
Bertrand, Natacha
Bingham, Tonya
Bingham, Paul
Birmingham, Christina
Blanchard, Brandi
Bleichert, Shonda
Bonville (Wiediger), Sheena
Brasie, Jacqueline
Brewer, Erica
Briggs, Rachel
Britten, Tammy
Brockway, Kristin
Brown, Lakilia
Browning, Joshua
Burke, Melissa
Burton, Joann
Button, Alison
Calvani, Joseph
Camacho-Holt, Lissette
Cania, Miranda
Carambia, Robin
Carey, Tammy
Carl, Kimberly
Caro, Cerissa D
Cast, Heather
Castro, Juan
Cheal, Patricia
Christina, Enrique M.
Cianfrocco, Peter
Ciociola, Ralph
Clark, Adrian
Colasanti, Lisa

Cole, Brooke
Coleman, Jennifer
Constance, Nestle
Cronin, Sara
Croniser, Hope
Cross, Peggy
Csete, Stephen
Danielski, Danielle
Danielski, Tina
Darvoe, Rebecca
Davis, Christina
Degeorge, Vincent
Demattio, David
Depasquale, Sarah
Deraway, Theresa
Dibble, Michael
Digristine, Stefani
Disalvo, Kim
Disalvo, Meagan
Dittrich, Lydia
Donohue, Patricia
Dooray, Daniella
Dorsino, Connor
Downing, Kathlene
Dragon, Savana
Drake, Tonya
Drake, Pauline
Dupont, Noelle
Durgan, Terri
Dutcher, Dymphna
Dyer, Tristan
Eason, Laveesha
Eaton, Katie
Ernenwein, Brett E.
Ernst, Kim
Esposito, Rachel
Ferebec, Tiffany
Ford, Zachary
Foresti, Nicholas
Fullington, Kandi
Furlow, Shanta Ann
Garland, Tami
Garlington, Dawn

General, Tyona
Gillet, Lindsey
Gilligan, Nicole
Godfrey, Heather
Goodspeed, Sara
Green, Cortney
Gricowolak, Vivian
Griffin, Rakiesha
Gruby, Misty
Gyimah, Richard
Hall, Cassandra
Hall, William
Hamell Hoyte, Tonya
Hancock, Ashley
Hanrahan, Megan C
Harrington, Michele
Heitzman, Lauren
Henderson, Kristen
Henry, Curtis
Hickey, Erin
Hill, Anita
Hill, Amanda
Hill, Joyce
Hoffert, Jesse
Hoffmeister, William
Holbert, Desiree
Howard, Zack
Humphrey, Sage
Hurley, Layna
Johnson, Taylor
Johnson, Angel
Johnson, Mirrissa
Johnson, Latonya
Johnson, Kimberly
Johnson, Mary
Johnson, Kayla
Jones, Dara
Jones, Kristy
Jones, Jeremy
Jones, Cammie
Kafka, Audrianna
Karst, Keisha
Kaylee, Wishart

Kirk, Leola
Klis, Nichole
Koperda, Mary
Kunkle, Patricia
Labarbera, Brenda
Labounty, Aurielle
Lamay, Kevin
Lashua, Jenna
Leffingwell, Ryan
Lisberg, Berissa
Lofstrom, Rachel
Long, Justine
Loomis, Susan
Loveland, David
Maddox, Danielle
Maine, Amanda
Manuele, Meagan
Marmol, Christine
Marsden, Julia
Mathis, Emilee
Matt, Thomas
Matt, Forrest
Medina, Eva
Medlin, Candy
Meola, Nichole
Merriweather, Esther
Meyers, Cody N
Millsap, Holly
Millson, Tasha
Monroe, Michael
Montgomery, Leroy
Morgan, Sarah
Morosco, Matthew
Mosley, Desiree
Murphy, Nancy
Myers, Pollyanna
Nellenbach, Carri
Nero, William
Nestle, Ashley
Newey, Joanne
Nicholas, Leigh
Nicholas, Foresti
Norales-Lino, Kerry

Nyberg, Christopher
Palmano, Mark
Parker, Lauren
Parker, Kelsey
Parry, Aleshia
Patterson, Donna
Peck, Janet
Perry, Debby
Peters, Patricia
Pietrowski, Aaron
Pietrowski, Madison
Potter, Breanna
Potter, Adrianna
Preski, Kimberly
Prue, James
Rathbun, John
Rawlings (Peck), Teshia
Reesh, Jennifer
Reid, Deborah
Relyea, Destiny
Reynolds, Richelle
Rice, Cathleen
Richards, Steven
Richardson, Paulette
Richardson, Ta'Aisa
Rieben, Rebecca
Rijo, Maria
Ritz, Lynn
Rivers, Tammy
Robinson, Kayla
Rocker, Ashley
Rodriguez, Genesis
Rogers, Shannon
Rose, Stephanie
Rushford, Tina
Russell, Courtney
Ruszala, Marian
Ruzicka, Alisha
Ryan, John
Schenk, Amanda
Schlieder, Matthew
Schrefer, Melissa
Schwenning, Holly

Scott, Thomas
Seaton, Amber
Seymour, Sheila
Seymour, Carolyn
Shaeffer, Deborah
Shelby, Amanda
Sheperd, Linda
Shirk, Deanna
Simmons, Stephanie
Slade, Deborah
Slawson, Amanda
Smith, Zachary
Smith, June A
Smith, Sharon A
Smith, Dakota
Sobles, Megan
Soriano, Carrie
Squadrito, Brianna
Stephenson, Jessica
Stewart, Patti
Streator, Geanna
Studer, Dana
Sullivan, Monica
Sulrzycki, Kathryn
Swancott, Penny
Swift, Alexis
Swift, Bianco
Symons, Insok
Symula, Christine
Talor, Latisha
Tamer, Nicholas
Tanner, Kathleen
Tarbania, Anthony
Thompson, Jessica
Thompson-Abdou, Kimberly
Tobiasson, Emma
Todd, Natalie
Toro, Maribella
Trask, Karlee
Traskey, Scott
Tresoline, Patsy
Turner, Patricia
Tuthill, Donna

Visalli, Dawn
Wade, Zachary
Walter, Barbara
Watkins, Misty
Watson, James
Wattley Jr., Cordell
Weaver, Kaitlyn
Wenzel, Anne
West, Julie
Whiffen, Nicole
Whipple, Jane
Williams, Courtney
Williams, Felicia
Williams, Michael
Williams, Nicole
Williams, Nichole M
Wilson, Lisa
Wilson, Pamela
Wood, Billie
Wood, Sandra
Woodward, Lisa
Wright, Brianna
Wyant, Chrystal
Yakuboski, Christy
Young, Timothy
Zeidner, Katie
Zwiefach, Alaysia

CHITTENANGO CENTER LLC
d.b.a. THE GRAND AT CHITTENANGO

Abolade, Adekemi
Baker, Marni-que
Baker, Renei
Bandera, Nicholas
Barbaritano, Mollie
Barlett, Nicole
Beadle, Tracy
Bentley, Mya
Bixby, Barbara
Bromfield, David
Bush, Kasandra
Chandler, Katelyn

Chase, Linda
Chesebro, Lisa
Colangelo, Pamela
Cole, Harold
Compoli, Larissa
Cormier, Theresa Ann
Cowart, Teresa
Cunningham, Jessica
Daniels, Shontia
Davis, Autumn
Decker, Donna
Derosa, Michele
Devine, Julianne
Donlon, Erin
Duncan, Jodi
Finck, Sharon
Fisher, Sarah
Flint, Susan
Forward, Bailey
Gloska, Jennifer
Glouse, Ashley
Graham, Johanna
Gulliver, Tracey
Hall, Jennifer
Hall, Erica
Houston, Marlo
Hunt, Jessaka
Huss, Kathryn
Infusino, Amanda
Jacobs, Eric
Jones, Malaka
Jorden, Kayla
Justian, Lindsay
Kinsey, Timisha
Kirwan, James
Latifovic, Sead
Learned, Carrie
Leigh, Cathy
Lloyd, Shannon
Lusardi, Melissa
Maisey, Elaine
Marks, Heather
Marshall, Vincent

Mason, Derek
Miller, Lisa
Moore, Brittney
Morreall, Donna
Mudge, Deborah
Ottoway, Barbara
Parise, Dawn
Pasternak, Marleen
Paul, Desiree
Pell, Amanda
Peterson, Elaundress
Pike, Jacquette
Quonce, Sandi
Roache, Traci
Roehm, Jo Ann
Schader, Joyce
Scott, Niesha
Seymour, Adrian
Sgarlata, Amber-Lee
Simmons, Terrella
Smith, Deanna
Smith, Kearsten
Smith, Natalie
Stalnaker, Nicole
Stevens, Carolyn
Storrings, April
Struble, Michelle
Sutter, Michael
Swieton, Olivia
Tennant, Mindy
Thomson, Jessica
Turple, Margo
Valletta, Jena
Vanbuskirk, Lisa
Verro, Mary
Walker, Steven
Wallis, Denise
Watkins, Heather
Whitmeyer, Harley
Whitmeyer, Tamatha
Wiggins, Michelle
Williams, Cynthia
Williamson, Sarah

Wilson, Carol
Woodruff, Patricia
Woody, Melody Irma
Yancey, Charles